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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Notice of *Ex Parte* Communication, PS Docket No. 06-229

Dear Ms. Dortch:

On November 16, 2011, Kevin Krufky, Jeffrey Marks, Morgan Wright, Michael McMenamin, Wim Brouwer, Maria Palamara and Tewfik Doumi of Alcatel-Lucent met by teleconference with Jennifer Manner, Pat Amodio, Yoon Chang, Behzad Ghaffari, Brian Hurley, Erika Olsen and Rasoul Safavian of the Commission.

The meeting's focus was to provide Alcatel-Lucent's perspective on the questions posed in the October 12, 2011 letter from Admiral James Barnett (Ret.), Chief, Public Safety and Homeland Security Bureau to Mike Simpson, Chief, Interoperable Communications, Texas Department of Public Safety.

Alcatel-Lucent supports the ongoing network identifier planning activities undertaken by the Public Safety Communications Research program ("PSCR") and the State of Texas, in which Alcatel-Lucent has been an active participant. Those activities are resulting in very similar solutions, and favor implementation of a single PLMN ID for public safety waiver jurisdictions. The PSCR has done excellent in-depth work in proposing how the wide range of network identifiers that depend on PLMN ID can be readily partitioned and allocated to waiver recipients if a single PLMN ID approach is used as the starting point for the public safety broadband network. This approach has been vetted to a much greater extent among industry participants than a multiple PLMN approach. Alcatel-Lucent urges that the Commission adopt a single PLMN ID approach for all waiver recipient networks as the most expeditious approach for those deployments.

As noted below, use of a single PLMN ID will enable economies of scale in roaming, interworking and bill settlement agreements with commercial operators by negotiating joint roaming agreements for all waiver recipients. This approach would alleviate the need for

each public safety jurisdiction to negotiate separate agreements with each commercial operator, which would especially disadvantage smaller waiver jurisdictions.

Furthermore, a move from multiple-PLMN IDs for waiver jurisdictions to a single PLMN ID (or from any “temporary” PLMN ID to a new one), long-term, would require public safety to incur substantial costs – both in terms of time and money – re-engineering various LTE network elements and networking parameters, and manually replacing or reprogramming UICC/SIM in all devices. The PLMN ID is used as part of various network identifiers in the network, including the International Mobile Subscriber Identification (“IMSI”) in end user equipment (“UE”). Even though IMSI is an element file within the UICC/SIM Card, changing or replacing the IMSI in UEs over the air is not an accepted practice. Typically this is done by replacing the UICC/SIM in the device, which requires physical access – taking the UEs out of the field for a period of time and requiring personnel resources to make the necessary changes to accommodate the new PLMN ID. The eNodeB is another example of a network element that needs to be modified as it contains PLMN ID, tracking area code, etc.

In the meeting, representatives from Alcatel-Lucent demonstrated that, if using a single PLMN ID, the frameworks for internetworking among waiver jurisdictions and roaming onto commercial networks could be in place *on day one*, when the first waiver jurisdictions “go live” this summer. 3GPP Standards already are in place for internetworking among the waiver jurisdictions that share a single PLMN ID. Simply stated, there is no technical barrier to internetworking among the waiver jurisdictions’ LTE networks in a single-PLMN ID architecture. While there will need to be coordination among waiver jurisdictions before internetworking takes place, such coordination is not complicated by a single PLMN ID approach, and would be needed regardless whether the waiver jurisdictions shared a PLMN ID or had different PLMN IDs.

For roaming onto commercial networks, Alcatel-Lucent proposes that a third party Internetwork Packet Exchange (“IPX”) provider would be the ideal solution as a single point of contact to facilitate roaming (including handling charging reconciliation) for all waiver jurisdictions with commercial partners. The IPX provider would be able to differentiate among public safety networks based on IMSI ranges. The IPX provider would also have the capability to send public safety roaming traffic to the correct jurisdictions, avoiding the need for a Diameter Edge Agent/Diameter Routing Agent in each of the early deployments, or even in the long term. Again, it is anticipated that this solution could be put in place *on day one* of waiver jurisdiction operations.

Alcatel-Lucent will continue to explore these proposals in order to provide greater detail in the Commission record.

Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,

/s/

Jeffrey A. Marks

cc: Jennifer Manner
Pat Amodio
Yoon Chang
Behzad Ghaffari
Brian Hurley
Erika Olsen
Rasoul Safavian